

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JEFFREY PUZZULLO,

Defendant.

INFORMATION

25 Cr.

25 CRIM

188

COUNT ONE

**(Conspiracy to Commit Securities Fraud and Wire Fraud)**

The Acting United States Attorney charges:

1. From at least in or about January 2018 through at least in or about June 2022, in the Southern District of New York and elsewhere, JEFFREY PUZZULLO, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated and agreed together and with each other to commit an offense against the United States, to wit, (a) securities fraud, in violation of Title 15, United States Code, Sections 78j(b) and 78ff, and Title 17, Code of Federal Regulations, Section 240.10b-5, and (b) wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that JEFFREY PUZZULLO, the defendant, and others known and unknown, including three coconspirators not named as defendants herein ("CC-1," "CC-2," and "CC-3"), willfully and knowingly, directly and indirectly, by use of a means and instrumentality of interstate commerce, and of the mails, and a facility of a national securities exchange, would and did use and employ, in connection with the purchase and sale of a security, a manipulative and deceptive device and contrivance, in violation of Title 17, Code of Federal Regulations, Section 240.10b-5 by: (a) employing a device, scheme, and artifice to defraud; (b) making an untrue statement of a material fact and omitting to state a material fact

necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; and (c) engaging in an act, practice, and course of business which operated and would operate as a fraud and deceit upon a person, in violation of Title 15, United States Code, Sections 78j(b) and 78ff.

3. It was a further part and an object of the conspiracy that JEFFREY PUZZULLO, the defendant, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

#### **Overt Acts**

4. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about July 8, 2020, CC-2, CC-3 and others participated in a live webinar for investors in Legacy Park bonds during which members of the conspiracy presented to investors, including investors in the Southern District of New York, misleading revenue projections for Legacy Park that were based on false documents that PUZZULLO worked with CC-1 and CC-2 to prepare.

b. In or about July 2020, CC-1 and CC-2 caused an investment bank to make available to potential investors false and misleading letters of intent, pre-contracts, and financial documents

via a data room, a web-hosted platform, that was accessed by investors in the Southern District of New York.

(Title 18, United States Code, Section 371.)

**COUNT TWO**  
**(Securities Fraud)**

The Acting United States Attorney further charges:

5. From at least in or about January 2018 through at least in or about June 2022, in the Southern District of New York and elsewhere, JEFFREY PUZZULLO, the defendant, willfully and knowingly, directly and indirectly, by the use of a means and an instrumentality of interstate commerce and of the mails, and of a facility of a national securities exchange, used and employed, in connection with the purchase and sale of a security, a manipulative and deceptive device and contrivance, in violation of Title 17, Code of Federal Regulations, Section 240.10b-5, by: (a) employing a device, scheme, and artifice to defraud; (b) making an untrue statement of material fact and omitting to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; and (c) engaging in an act, practice, and course of business which operated and would operate as a fraud and deceit upon a person, to wit, PUZZULLO caused false and misleading statements about Legacy Park's projected revenue and the extent to which customers had made binding commitments to use Legacy Park to be made to investors, and aided and abetted the same.

(Title 15, United States Code, Sections 78j(b) and 78ff; Title 17, Code of Federal Regulations, Sections 240.10b-5; and Title 18, United States Code, Section 2.)

**COUNT THREE**

**(Wire Fraud)**

The Acting United States Attorney further charges:

6. From at least in or about January 2018 through at least in or about June 2022, in the Southern District of New York and elsewhere, JEFFREY PUZZULLO, the defendant, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, PUZZULLO engaged in a scheme to obtain money from investors by means of false and misleading statements about Legacy Park's projected revenue and the extent to which customers had made binding commitments to use Legacy Park, and, in furtherance of that scheme, used interstate wires, some of which were transmitted to, from, or through the Southern District of New York.

(Title 18, United States Code, Sections 1343 and 2.)

**COUNT FOUR**

**(Aggravated Identity Theft)**

The Acting United States Attorney further charges:

7. From at least in or about January 2018 through at least in or about June 2022, in the Southern District of New York and elsewhere, JEFFREY PUZZULLO, the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, PUZZULLO used without consent the names and signatures of purported



future customers of Legacy Park during and in relation to the wire fraud violation charged in Count Three of this Information.

(Title 18, United States Code, Sections 1028A(a)(1),  
1028A(b), and 2.)

### **FORFEITURE ALLEGATIONS**

8. As a result of committing one or more of the offenses charged in Counts One, Two, and Three of this Information, JEFFREY PUZZULLO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

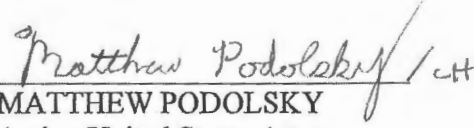
#### **Substitute Assets Provision**

9. If any of the above-described forfeitable property, as a result of any act or omission by the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 981(a)(1)(C);  
Title 21, United States Code, Section 853(p);  
Title 28, United States Code, Section 2461.)

  
MATTHEW PODOLSKY  
Acting United States Attorney